

Final Report Work Group
Recommendations and Questions for the FACDQ
Related to the Draft Outline of the Final Report
November 20, 2006

The Final Report Work Group* held a one-hour call on Monday, November 13 to review a draft report outline and determine questions to pose to the Committee at the December 6-8 FACDQ meeting. The topics discussed included the following:

- Audience for the report
- Purpose of the report
- Content of the report, including the Executive Summary, the report itself, and the Appendices
- Additional committee materials that would be available at the EPA website

Comments related to these topics are discussed below. The revised draft outline is presented on pages 2-4.

Audience: The Work Group identified two primary audiences:

- The EPA Administrator who requested the committee's product.
- Stakeholders who have a keen interest in the FACDQ's recommendations and their implementation. This group includes those who have been heavily involved and are familiar with the committee's process/product as well as others who have been less involved but who will care deeply about the outcomes. Enough information about the FACDQ's charge, process and recommendations needs to be provided to meet the needs of both types of stakeholder.

A third audience – the public – may become interested over time and will need access to information to understand the problem the FACDQ tackled, how the committee developed its recommendations, and what those recommendations are.

Purpose:

- When EPA initiates rulemaking, it has to explain the rationale for proposed action(s). It would be very helpful if the committee's report provided detailed rationale for the committee's recommendations.
- Informing stakeholders about the consensus recommendations and how they were derived will facilitate the rulemaking process.

Content:

- **Executive Summary:** It assumes the reader will be familiar with the issues and will go right to the package of FACDQ's consensus recommendations. This

* Work Group members included Dave Akers, Zonetta English, Larry LaFleur, Michael Murray and Mary Smith. Cary Jackson was ill and unable to participate.

section will lay out how the committee expects those recommendations to go forward after the committee's charter ends.

- The **body of the report** will present background to the problem that the FACDQ was chartered to address, the process by which the FACDQ carried out its work and made decisions, and the consensus recommendations that the committee developed. If the committee fails to reach consensus on specific issues, the report will describe the differing perspectives and the rationale behind them. This could be in the form of minority reports.
- The **Appendices** will include consensus documents as well as other documents that were crucial to the FACDQ's process and recommendations, whether or not they were consensus documents.
- All of the committee's documents, including discussion documents and interim products, will be available at the EPA website/docket. (Mary Smith will ask how long documents will be available at EPA's website.)

Format:

- Mary Smith will ask EPA's Dispute Resolution Center to prepare a 2-3 page document that outlines options for the report, based on reports prepared by other federal advisory committees.

Observations:

- The draft outline is a living document. The proposed content will be revised to reflect the decisions the committee makes.

Questions for FACDQ Discussion and Direction:

- Should the report itself be a consensus document that everyone agrees to in its entirety? If not, what sections should be consensus documents? What sections do not have to be?
- How long should the report be?
- What is the timeframe and schedule for producing the report?
- Who will write specific sections of the report?

Draft Outline of the Final Report

I. Executive Summary

II. FACDQ Recommendations

A. Recommended Procedure or Procedures for Detection and Quantitation

This recommendation will be a procedure or procedures for detection and a procedure or procedures for quantitation. The recommendation will be developed, in part, based on the results of a pilot test and an analysis of those results relative to characteristics that the committee identified in the document, "What do we need a procedure to do?"

1. What Do We Need a Procedure to Do?

2. Pool of Procedures, Procedures to Pilot Test, and Final FACDQ Recommended Procedure(s)
3. Recommendations on Data Quality Objectives
4. Recommended Procedure(s) to Address the Following Four Measurement Quality Objectives:
 - a) False Positives
 - b) False Negatives
 - c) Accuracy
 - d) Precision
5. FACDQ Recommendations Related to a Procedure Approach
 - a) Single Lab
 - b) Multi-Lab
 - c) Inter-Lab

B. Definitions of Detection and Quantitation

C. Uses of the Procedure(s)

1. Method Validation and Promulgation
2. Future Updates
3. Setting Permit Limits
4. Calculating Averages for Compliance/Enforcement
5. Evaluating Compliance and Enforcement
6. Analytical Data Reporting for Reasonable Potential Analyses
7. Analytical Data Reporting for Compliance/Enforcement
8. Analytical Data Reporting for Ambient Monitoring
9. Initial Demonstration of Proficiency by Labs
10. Laboratory QA/QC

D. Implementation of the Recommendations

1. Rulemaking
2. Guidance
3. Post Pilot-Study Verification of Recommended Procedure(s)
4. Revisions to Existing Analytical Methods (i.e. “Bad Boys”)
5. EPA Development of More Sensitive and Selective Analytical Methods
 - a) Prioritized list of analytical methods
 - b) Incentives
6. ICIS (national database)
7. Outreach by EPA and Others

E. Recommendations on Other Issues

1. Matrix Effects
2. Intermittent Blank Contamination
3. Alternative Test Procedures

III. Purpose of the FACDQ, Members, and Committee Process

IV. Pilot Study Final Report

V. Looking to the Future and Final Observations

Appendices

Members of the FACDQ

Procedure(s)

Key Documents on Policy Issues

- What Do We Need a Procedure to Do?
- Uses of Detection and Quantitation Results
- Measurement Quality Objectives
- Matrix effects
- Implementation

Key Documents on Technical Issues

- Pilot Study Design, Results, and Recommendations
- Michigan Manufacturers Association (MMA) Data and Evaluation
- Issues to Consider When Defining Detection and Quantitation – White Paper (John Phillips' paper, Technical Work Group)
- Matrix Comparing Detection and Quantitation Procedures
- Glossary
- Procedures 101